

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND

In re:

TERESA M ROSS

Debtor

*

*

*

*

Case No. 14-19749-DER

Chapter 13

*

*

*

*

*

*

*

MOTION TO DISMISS CASE FOR
MATERIAL DEFAULT IN PLAN PAYMENTS

Ellen W. Cosby, Chapter 13 Trustee, files this Motion to Dismiss Case and states as follows:

1. The plan in this Chapter 13 case was confirmed by Order entered November 14, 2014.
2. The Debtor is in material default under the terms of the plan by having failed to maintain the payments required by the plan. The default in payments now totals \$1,800.00, approximately 4 months.
3. The failure of Debtor to make plan payments has created an unreasonable delay prejudicial to the creditors in this case.
4. For the reasons stated, cause exists under 11 U.S.C. §1307(c) to dismiss this case.

WHEREFORE, the Trustee requests this Court to dismiss this case, and to grant such other relief as is just.

Date: May 14, 2015

/s/ Ellen W. Cosby

Ellen W. Cosby, Trustee
300 E. Joppa Road, Suite #409
Towson, MD 21286
(410) 825-5923
inquiries@ch13balt.com

TO THE DEBTOR: TAKE NOTICE THAT, UNLESS YOU FILE A RESPONSE IN WRITING WHICH JUSTIFIES OR EXPLAINS THE ALLEGATIONS IN THIS MOTION WITHIN 21 DAYS OF THE DATE IN THE CERTIFICATE OF SERVICE BELOW, THIS CASE MAY BE DISMISSED WITHOUT FURTHER NOTICE. THE RESPONSE MUST BE FILED WITH THE BANKRUPTCY COURT, WITH A COPY SERVED ON THE TRUSTEE.

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2015 a copy of foregoing Motion to Dismiss Case was mailed by first-class mail to:

TERESA M ROSS
22 N. SPRING STREET
BALTIMORE, MD 21231

and was transmitted electronically through ECF to:

JAMES R. LOGAN ESQUIRE
2419 MARYLAND AVENUE
BALTIMORE, MD 21218-0000

/s/ Ellen W. Cosby
Ellen W. Cosby, Trustee